

**UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	<b>Donnell B. Simon</b>	:	<b>Chapter 13</b>
		:	
	<b>Debtor</b>	:	
	<hr/>	:	
<b>NewRez LLC</b>		:	
<b>Movant</b>		:	<b>Bankruptcy Case Number</b>
		:	<b>20-12703 ELF</b>

**Debtor's Response to the Motion of NewRez LLC  
for Relief from the Automatic Stay**

Debtor, **Donnell B. Simon**, by and through his counsel, **Michael Schwartz, Esquire**, hereby files this response to the Motion for Relief of NewRez LLC and in support thereof avers as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.
4. ADMITTED.
5. ADMITTED.
6. ADMITTED.
7. ADMITTED.
8. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.
9. DENIED. Answering Debtors deny the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

10. DENIED. Answering Debtors deny the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

11. DENIED. Answering Debtors deny the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

12. DENIED. Answering Debtors deny the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

13. DENIED. Answering Debtors deny the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

14. No Answer Required.

15. DENIED. Answering Debtors deny the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

**WHEREFORE**, Debtor, **Donnell Simon**, requests this Honorable Court deny the motion of NewRez LLC for relief from automatic stay and to declare the automatic stay is still in effect.

Respectfully Submitted,

/s/ Michael Schwartz  
**MICHAEL SCHWARTZ, ESQUIRE**  
Attorney for Debtor